

1 NICHOLAS A. TRUTANICH
2 United States Attorney
3 District of Nevada
4 Nevada Bar Number 13644
5 DANIEL R. SCHIESS
6 Nevada Bar No. 5483
7 Assistant United States Attorney
8 501 Las Vegas Blvd. South, Suite 1100
9 Las Vegas, Nevada 89101
10 Phone: (702) 388-6336
11 Email: dan.schiess@usdoj.gov

12 *Representing the United States of America*

13
14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 -oOo-

17 UNITED STATES OF AMERICA,
18 Plaintiff,
19 vs.
20 PIERRE FRANCO-RAMOS,
21 Defendant.

22 Case No. 2:15-cr-00286-RFB-VCF

23 **STIPULATION TO CONTINUE**
SENTENCING

24 (First Request)

25
26 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich,
27 United States Attorney, and Daniel R. Schiess, Assistant United States Attorney, counsel for the
28 United States of America, and Craig A. Mueller, Esq., counsel for defendant Pierre Franco-
29 Ramos, that the sentencing currently scheduled for September 19, 2019, at the hour 2:00 p.m., be
30 vacated and set to a date and time convenient to this Court, but no sooner than three weeks, and
31 after 3 p.m. if convenient with the Court.

32 The Stipulation is entered into for the following reasons:

1. Counsel for Franco-Ramos has had difficulty opening the electronic version of the Presentence Investigative Report and only recently was able to do so. He needs additional time to review the report and review it with the defendant.

2. Counsel for the United States, AUSA Daniel R. Schiess, is currently in trial in *United States v. Pastor Palafox et al*, 2:16-cr-00265-GMN. The trial is in session Monday through Thursday from 9:00 a.m. – 3:00 p.m.

3. The defendant is not detained and does not object to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow for Government to timely appear at the sentencing hearing, and to allow defense counsel reasonable time to effectively prepare for the hearing, taking into account the exercise of due diligence.

Respectfully submitted this 17th day of September, 2019.

NICHOLAS A. TRUTANICH
United States Attorney

/s/ Craig A. Mueller
CRAIG A. MUELLER, Esq.
Counsel for FRANCO-RAMOS

/s/ Daniel R. Schiess
DANIEL R. SCHIESS
Assistant United States Attorney

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,
vs.
PIERRE FRANCO-RAMOS,
Defendant.

Case No. 2:15-cr-00286-RFB-VCF
FINDINGS OF FACT,
CONCLUSIONS OF LAW AND
ORDER

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. Counsel for Franco-Ramos has had difficulty opening the electronic version of the Presentence Investigative Report and only recently was able to do so. He needs additional time to review the report and review it with the defendant.

2. Counsel for the United States, AUSA Daniel R. Schiess, is currently in trial in *United States v. Pastor Palafox et al*, 2:16-cr-00265-GMN. The trial is in session Monday through Thursday from 9:00 a.m. – 3:00 p.m.

3. The defendant is not detained and does not object to the continuance. The parties agree to the continuance.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow for continuity of counsel the Government, and to allow defense counsel reasonable time to effectively prepare, taking into account the exercise of due diligence.

ORDER

IT IS FURTHER ORDERED that the sentencing currently scheduled for September 19, 2019, at the hour of 3:00 p.m., be vacated and continued to October 11, 2019 at the hour of 3:45 p.m.

DATED this 18th day of September, 2019.

18

RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE